

REMARKS

This responds to the Office Action mailed on April 5, 2005.

Claim 5 was previously canceled; claims 1, 7, and 14 are amended; as a result, claims 1-4 and 6-20 are now pending in this application.

Claims 1-4 and 6-18 were rejected under 35. U.S.C. 103(a) as being unpatentable over Ferrel in view of admissions. It is of course fundamental that in order to sustain an obviousness rejection that each and every step or element in the rejected claims must be taught or suggested in the cited references.

Applicant respectfully disagrees with the Examiner's use of statements in the Background of the Specification for purposes of asserting admissions that are being used for rendering Applicant's invention obvious. Applicant does not disagree with what was stated in the Background Section of the Specification; rather, Applicant disagrees with how the Examiner is interpreting those written statements. First, Applicant would like to point out that the conversion utilities discussed in the Background are used in connection with predefined layouts, as is discussed at length in the Background Section. Second, the conversion utilities are specifically discussed as problematic in their ability to handle multiple data types with complex layouts.

Applicant's claims specifically discuss multiple types of data; namely, floating objects and text objects. Thus, Applicant respectfully believes the Examiner's interpretation is overly simplistic and incorrect, since the claims positively recite two types of data and since the Background specifically states that this situation is problematic with existing conversion utilities. Accordingly, Applicant asserts that the statements must be read in context and the context clearly recites known limitation with existing conversion utilities and when these limitations are included in view of the claimed language of Applicant's invention it is clear that they are not applicable and do not render Applicant's invention obvious.

With respect to the Ferrel reference, Applicant has amended the independent claims to more clearly point out limitations that are not taught or suggested in the Ferrel reference. Specifically, Ferrel is directed to rendering a layout for an entire file having multiple pages and

not a single output page of media. In this approach, Ferrel is not concerned with any particular page's rendering. The example reference supplied by the Examiner details an editor associated with the Ferrel invention that permits a user to drag and drop objects to create a layout. The discussion does not discuss how data is rendered at runtime. The order and layout is defined by the style sheet and as was previously argued the Ferrel reference elaborates in detail that the format is not changed it is only the layout and presentation that is changed.

There is no teaching or suggestion of a teaching in Ferrel where text areas and floating areas are populated by streaming text objects and floating objects to the areas; such limitations are now positively recited in Applicant's amended independent claims 1 and 7. Example support for such limitation is supplied in Applicant's original filed specification on page 8 lines 5-10. Ferrel also continues to lack a teaching of converting to different formats. Moreover, the statements in the Background do not admit these teachings because those statements specifically state conversion utilities are problematic when multiple data types are used in a single data file and Applicant's claims 1 and 7 recite at least two different data types; namely text objects and floating objects.

Thus, Applicant respectfully requests that the rejections with respect to claims 1 and 7 and their corresponding dependent claims be withdrawn and these claims be allowed.

With respect to Applicant's amended claim 15, there is no teaching or suggestion of a teaching in Ferrel where an area for a body is automatically expanded; such a limitation is now positively recited in amended independent claim 15. In fact, the style sheet in Ferrel cannot be dynamically modified to accommodate such a limitation and therefore Applicant respectfully asserts that Ferrel is incapable of teaching the recited limitation of automatic expansion.

Therefore, the rejection with respect to claim 15 should be withdrawn and this claim allowed.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (513) 942-0224 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

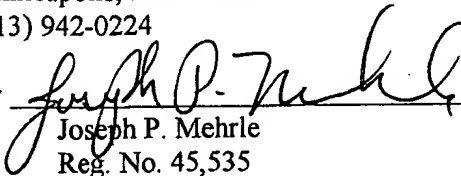
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Date 07-05-05

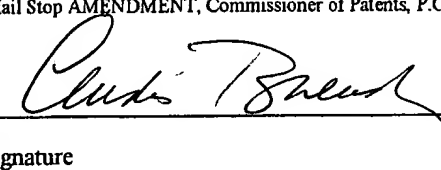
By


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CANDIS BUENDING

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